

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

JACOB GAVIN HILES,

Plaintiff,

v.

CABLE NEWS NETWORK, INC.,

Defendant.

Case No. 2:23-cv-351-AWA-LRL

**SECOND DECLARATION OF JAY WARD BROWN IN SUPPORT
OF DEFENDANT CABLE NEWS NETWORK, INC.'S
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

I, Jay Ward Brown, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner in the law firm of Ballard Spahr LLP, counsel for Defendant Cable News Network, Inc. ("CNN") in this action. I submit this declaration in support of CNN's Motion to Dismiss Plaintiff's Amended Complaint and have personal knowledge of the facts stated herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Statement of Facts in support of the Criminal Complaint filed in *United States v. Jacob Hiles*, Case No. 21-cr-155-ABJ (D.D.C. Jan. 15, 2021), ECF No. 1-1.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Dated: August 28, 2023

/s/ Jay Ward Brown

Jay Ward Brown